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*Attorney for Defendant*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

\* \* \*

UNITED STATES OF AMERICA,

Plaintiff,

vs.

TRACEY BROWN,

Defendant.

CASE NO.: 2:11-CR-00334-APG-GWF

**STIPULATION TO CONTINUE  
SENTENCING**

IT IS HEREBY STIPULATED AND AGREED, by and between TRACEY BROWN, by and through JONATHAN POWELL, ESQ., counsel for the Defendant, and the UNITED STATES OF AMERICA, by and through DANIEL COWHIG, Assistant United States Attorney, that the Sentencing date in the above-captioned matter, currently set for October 28, 2014, be continued until after November 19, 2015, the currently scheduled date for argument on Defendant's Motion to Unseal Grand Jury Transcripts.

1. Defendant has recently filed a motion to unseal the grand jury transcripts. Defendant is requesting said information in preparation for his appeal.
2. The Government has no objection to the requested continuance.
3. Defendant has no objection to a continuance of this matter. Defendant is in custody.
4. Denial of this request for continuance would result in a miscarriage of justice.

1           5. This request for a continuance is made in good faith and is not intended to delay the  
2           proceedings in this matter.

3           6. For all the above-stated reasons, the ends of justice would be best served by a  
4           continuance of the sentencing date.

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7       DATED this 27<sup>th</sup> day of October, 2015.

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9           /s/ Jonathan Powell  
10          JONATHAN POWELL, ESQ.  
11          Counsel for Defendant BROWN

/s/ Daniel Cowhig  
          DANIEL COWHIG  
          Assistant United States Attorney

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

\* \* \*

UNITED STATES OF AMERICA,

Plaintiff,

vs.

TRACEY BROWN,

Defendant.

CASE NO. 2:11-cr-00334-APG-GWF  
**ORDER TO CONTINUE SENTENCING**

**FINDINGS OF FACT**

Based on the pending Stipulations of the parties, and good cause appearing therefore, the Court finds that:

1. Defendant has recently filed a motion to unseal the grand jury transcripts. Defendant is requesting said information in preparation for his appeal.
2. The Government has no objection to the requested continuance.
3. Defendant has no objection to a continuance of this matter. Defendant is in custody.

**CONCLUSIONS OF LAW**

1. Denial of this request for continuance would result in a miscarriage of justice.
2. This request for a continuance is made in good faith and is not intended to delay the proceedings in this matter.

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1 3. For all the above-stated reasons, the ends of justice would be best served by a  
2 continuance of the sentencing date.

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4 **ORDER**

5 IT IS ORDERED that the Sentencing Hearing scheduled for October 28, 2015, be  
6 continued.

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8 IT IS FURTHER ORDERED that the Sentencing in this matter be scheduled for the  
9 29th day of December, 2015, at 10:00 am/~~pm~~.

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11 **DATED** this 27th day of October, 2015.

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17 UNITED STATES DISTRICT JUDGE  
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